

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PETER GARVEY, individually and on behalf  
of a class of similarly situated individuals,

Plaintiff,

v.

CITIZENS FOR RAUNER, INC., an Illinois  
corporation; and BRUCE RAUNER,  
an individual,

Defendants.

Civil Action No. 1:18-cv-7919

Hon. Jorge L. Alonso

**DEFENDANT BRUCE RAUNER’S MOTION TO DISMISS  
PLAINTIFF’S FIRST AMENDED COMPLAINT**

Defendant Bruce Rauner (“Rauner”) hereby moves for dismissal of Plaintiff’s First Amended Complaint for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6). The support for Rauner’s Motion is set forth in the simultaneously filed Memorandum of Law.

WHEREFORE, and for all the reasons set forth in his Memorandum of Law, Rauner respectfully requests that this Court grant his motion to dismiss Plaintiff’s First Amended Complaint against Rauner with prejudice.

**DATED: September 9, 2019**

BRUCE V. RAUNER

By: /s/ Jordan P. Vick  
One of His Attorneys

Jordan P. Vick (jvick@seyfarth.com)  
Michael R. Levinson (mlevinson@seyfarth.com)  
Katelyn R. Miller (krmiller@seyfarth.com)  
SEYFARTH SHAW LLP  
233 South Wacker Drive, Suite 8000  
Chicago, Illinois 60606-6448  
Telephone: (312) 460-5000  
Facsimile: (312) 460-7000

**CERTIFICATE OF SERVICE**

I, Jordan P. Vick, an attorney, certify that I caused the foregoing Defendant Bruce Rauner's Motion to Dismiss Plaintiff's First Amended Complaint to be served upon all persons and entities authorized and registered to receive such service through the Court's Case Management/Electronic Case Files (CM/ECF) system on September 9, 2019.

/s/Jordan P. Vick